

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MELISSA A. CARLSTROM,

Civil Action No. 11-155

Plaintiff,

v.

Judge Mark R. Hornak

RESEARCH PHARMACEUTICAL
SERVICES, INC.,

Defendant.

JURY TRIAL DEMANDED

STIPULATION

AND NOW, come Plaintiff, Melissa A. Carlstrom, and Defendant, Research Pharmaceutical Services, Inc., by and through their respective undersigned counsel in the above-captioned matter, and hereby file the following stipulation:

The parties hereby agree that, as part of the case, counsel for the Defendant shall be able to read and/or the parties may offer through testimony, the following to the jury as a stipulation of the parties:

At the time Plaintiff was hired by RPS in July 2009, she was assigned to work as a CRA with Allergan, a client of RPS. Upon learning that Plaintiff had suffered a broken foot in August 2009, Allergan agreed to excuse Plaintiff temporarily from the travel requirements of her position as a CRA. Subsequently, because Plaintiff was unable to resume air travel on October 7, 2009 as a result of her foot injury, Allergan requested that Plaintiff be removed from the Allergan team.

Other than the foregoing, no witness shall testify in any way about any statements made, or direction given, by Barbara Snader regarding the Plaintiff, whether orally or in writing. In addition, neither party will seek to introduce nor have any witness testify about the notes dated October 20, 2009, including notes of the conversations allegedly

held between Katrina Becher and Barbara Snader on that date, which notes were provided to Plaintiff on May 17, 2012.

STIPULATED TO THIS 10TH DAY OF JULY, 2012, BY:

/s/James W. Carroll, Jr.

James W. Carroll, Jr.
Pa. I.D. No. 21830

Lori R. Miller
PA I.D. No. 85774

Rothman Gordon, P.C.
310 Grant Street
Third Floor, Grant Building
Pittsburgh, PA 15219
(412) 338-1117 – direct dial
(412) 412-246-1717 – direct fax
JWCarroll@rothmangordon.com
LRMiller@rothmangordon.com
Attorneys for Plaintiff

/s/Craig W. Snethen

Craig W. Snethen
PA I.D. 86050

Jackson Lewis, LLP
One PPG Place, 28th Floor
Pittsburgh, PA 15222
Phone: (412) 232-0404
snethenc@jacksonlewis.com

Attorneys for Defendant